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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

)	
UNITED PROMOTIONS, INC. and)	
FERNANDO FIGUEREDO,)	
)	C.A. No. 2011-CV-6892
Petitioners,)	
)	Judge Der-Yeghiayan
v.)	
)	Magistrate Judge: Brown
LINDSAY CORP., ANDRES GACHARNA,)	
and CATHERINE E. LINDSAY,)	
)	
Respondents.)	

PETITIONERS' NOTICE OF MOTION

Petitioners United Promotions, Inc. and Fernando Figueredo hereby provide notice to Respondents Lindsay Corp., Andrew Garcharna, and Catherine E. Lindsay that Petitioners' MOTION FOR ENTRY OF DEFAULT AND JUDGMENT AGAINST RESPONDENT LINDSAY CORP. (filed and served on Respondents on December 2, 2011 and assigned docket no. 022) shall be heard before Judge Der-Yeghiayan on Wednesday, December 7, 2011, 9:00 am at the United States District Court for the Northern District of Illinois, Eastern Division, in Courtroom 1903.

Dated: December 5, 2011 Respectfully submitted,

/s/ Jon H. Beaupré

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LINDSAY CORP., ANDRES GACHARNA,)	-
and CATHERINE E. LINDSAY,)	
)	
Respondents.	_)	

CERTIFICATE OF SERVICE

I, Jon H. Beaupré, hereby certify that on December 5, 2011, I served the attached PETITIONERS' NOTICE OF MOTION and the corresponding MOTION FOR ENTRY OF DEFAULT AND JUDGMENT AGAINST RESPONDENT LINDSAY CORP. via personal process server upon:

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Thomas Kanyock
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Catherine E. Lindsay

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Dated: December 5, 2011 ______/s/ Jon H. Beaupré Jon H. Beaupré